

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
RCRA Compliance Evaluation Inspection
Addendum to 6/18/08 Inspection

Ferro Corporation
251 West Wylie Avenue
Washington, PA 15301

Telephone Number: (724) 223-5900

Date of Inspection: 10/29/08

RCRA Identification Number: PAD041731670

EPA Representative:

Clark S. Conover
Environmental Scientist
RCRA Compliance & Enforcement
(304) 231-0502

Facility Representatives:

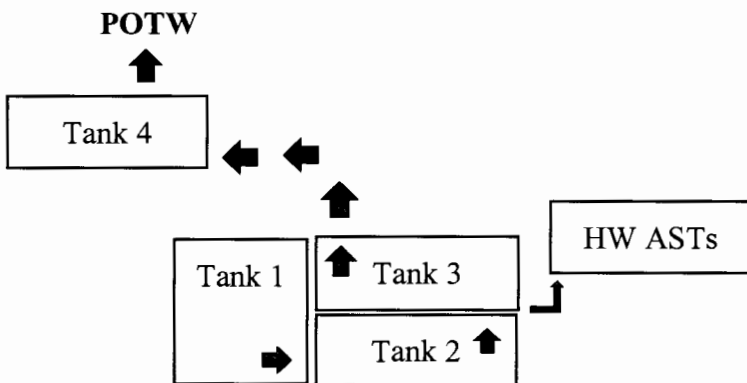
Michael Pellegrini
Environmental Manager

Background

On October 29, 2008, EPA's Land & Chemicals Division conducted a follow-up inspection to the June 18, 2008 Compliance Evaluation Inspection under the Resource Conservation and Recovery Act ("RCRA"), as amended, 42 U.S.C. Section 6901 et seq. of Ferro Corporation located at 251 West Wylie Avenue in Washington, Pennsylvania. The follow-up inspection concentrated on the waste water treatment tank being utilized at the facility. During the original inspection this tank was described as a self contained tank.

Inspection Observations

The inspection began with a verbal description of the tank system provided by Michael Pellegrini, Ferro's Environmental Manager. Mr. Pellegrini stated that the tank in question is actually a series of three tanks which then feed into a final tank within the wastewater treatment room prior to being discharged into the local P.O.T.W. under an N.P.D.E.S. permit. The first tank is a settling tank. In the second tank chemicals are added for PH balance prior to being discharged to the third tank where polymers are added. It is the bottoms from these three tanks which are then transferred to above ground hazardous waste storage tanks prior to being manifested out as a hazardous waste. The tanks are laid out in the following configuration:

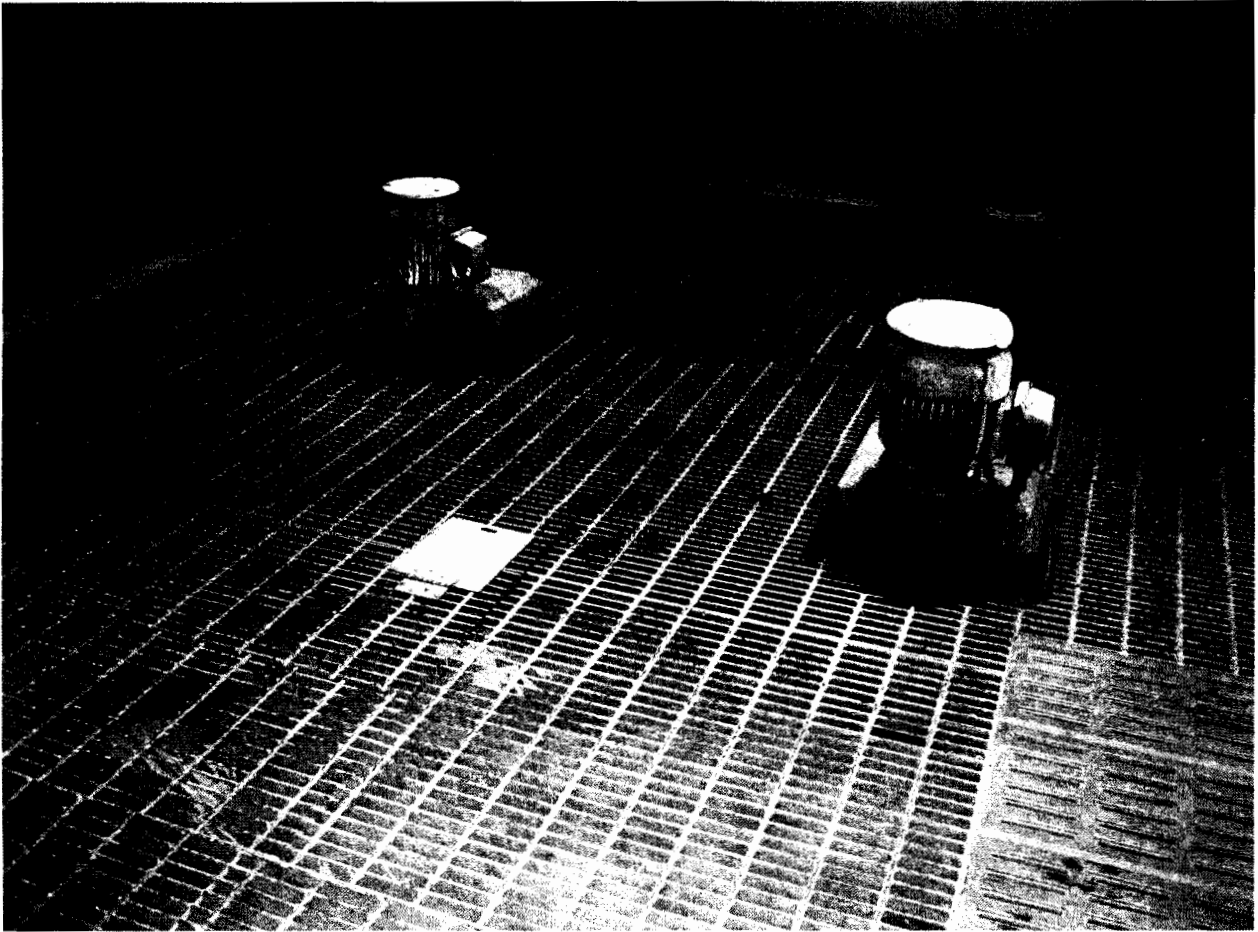


Based upon the observation observed during the follow-up inspection it is determined that the waste water tanks are in fact part of the facility's waste water treatment system and that the bottoms from the waste water treatment tanks are not subject to RCRA until they are removed from the waste water tanks and placed in the ASTs.

Clark S. Conover

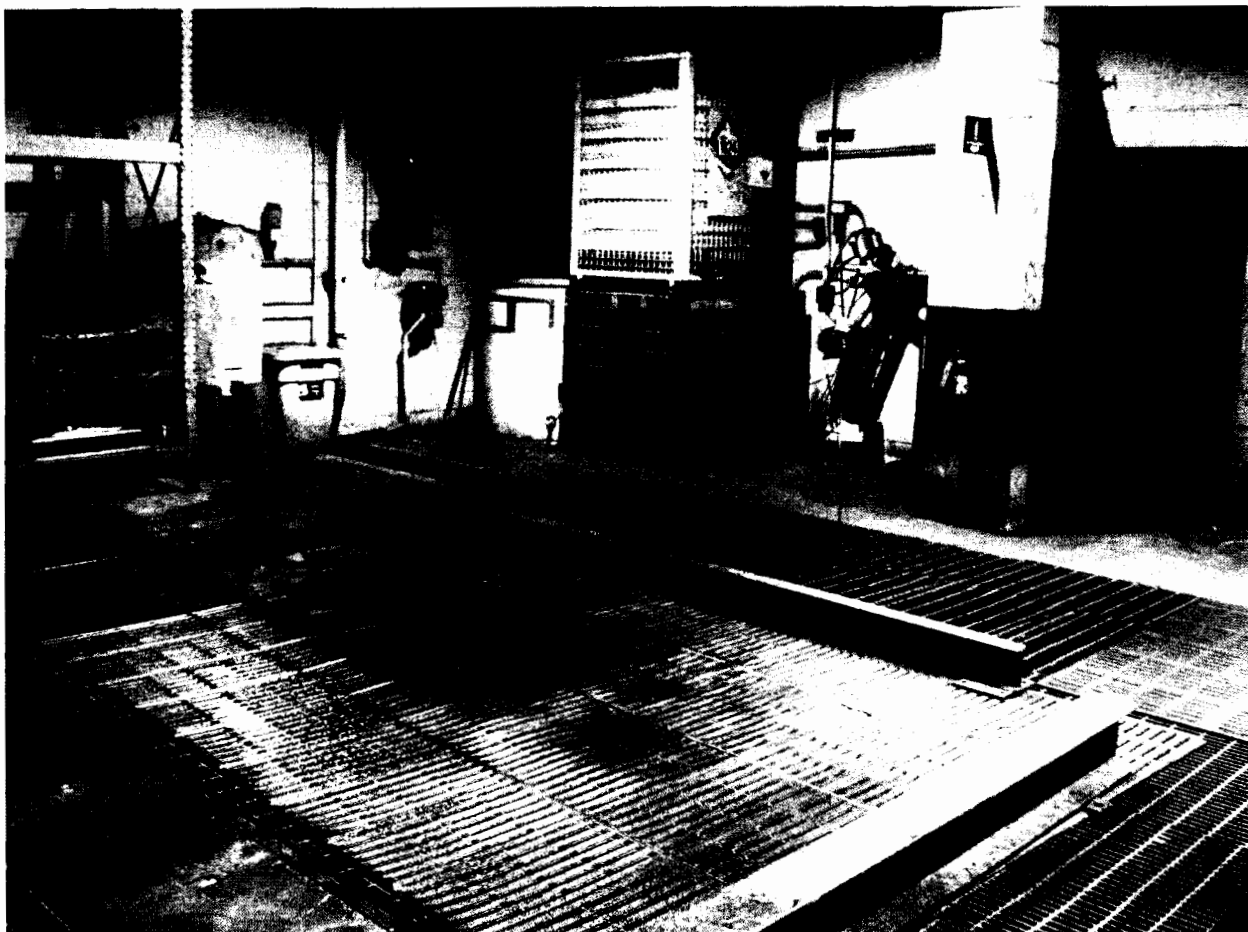
November 12, 2008

Date



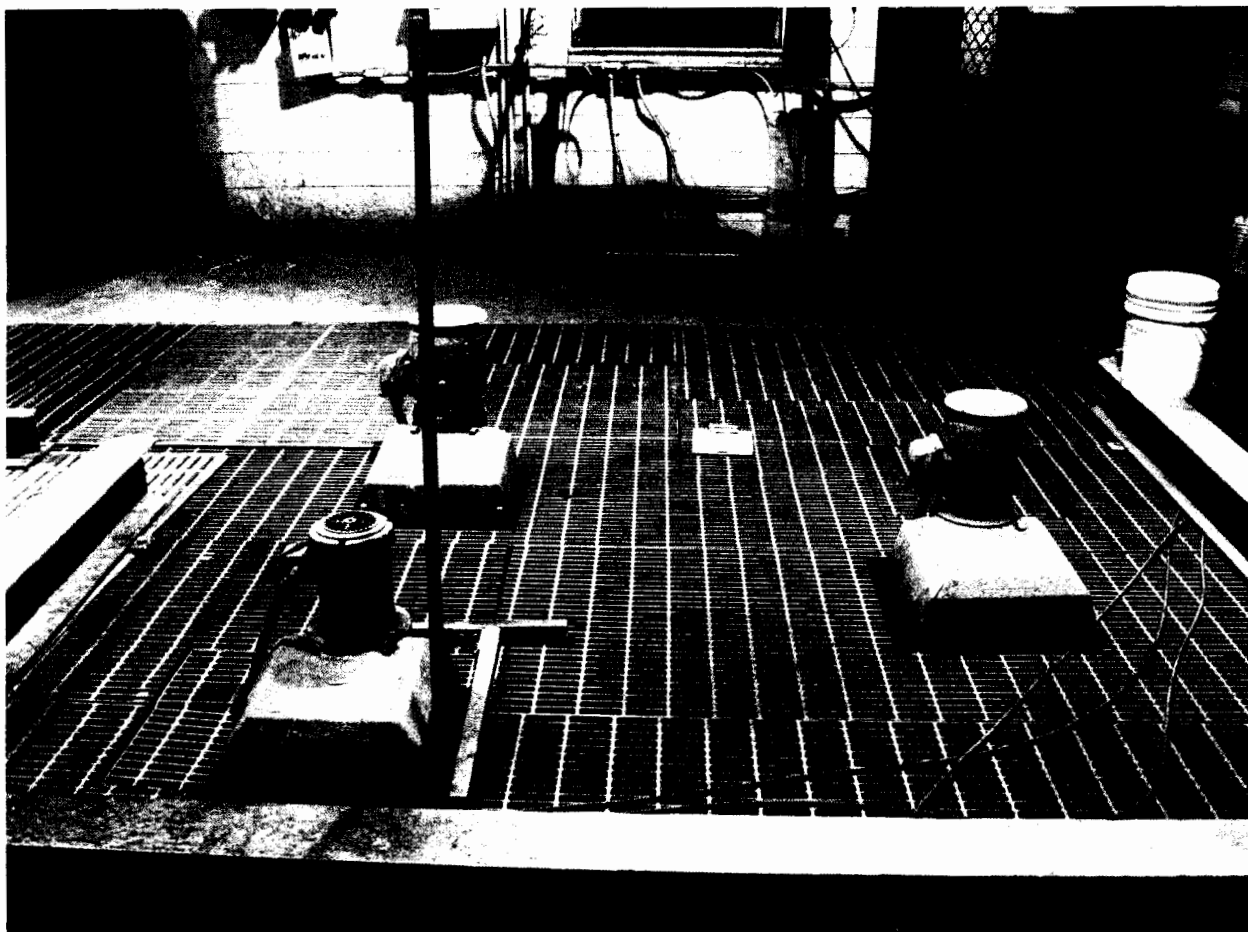
Ferro Corporation
Washington, PA
ID#: PAD041731670
Inspected: October 29, 2008
Inspector: Clark S. Conover
EPA/RIII/Wheeling
Photo #: 1

This photo depicts tanks #2 & #3.



Ferro Corporation
Washington, PA
ID#: PAD041731670
Inspected: October 29, 2008
Inspector: Clark S. Conover
EPA/RIII/Wheeling
Photo #: 2

This photo depicts tank #1.



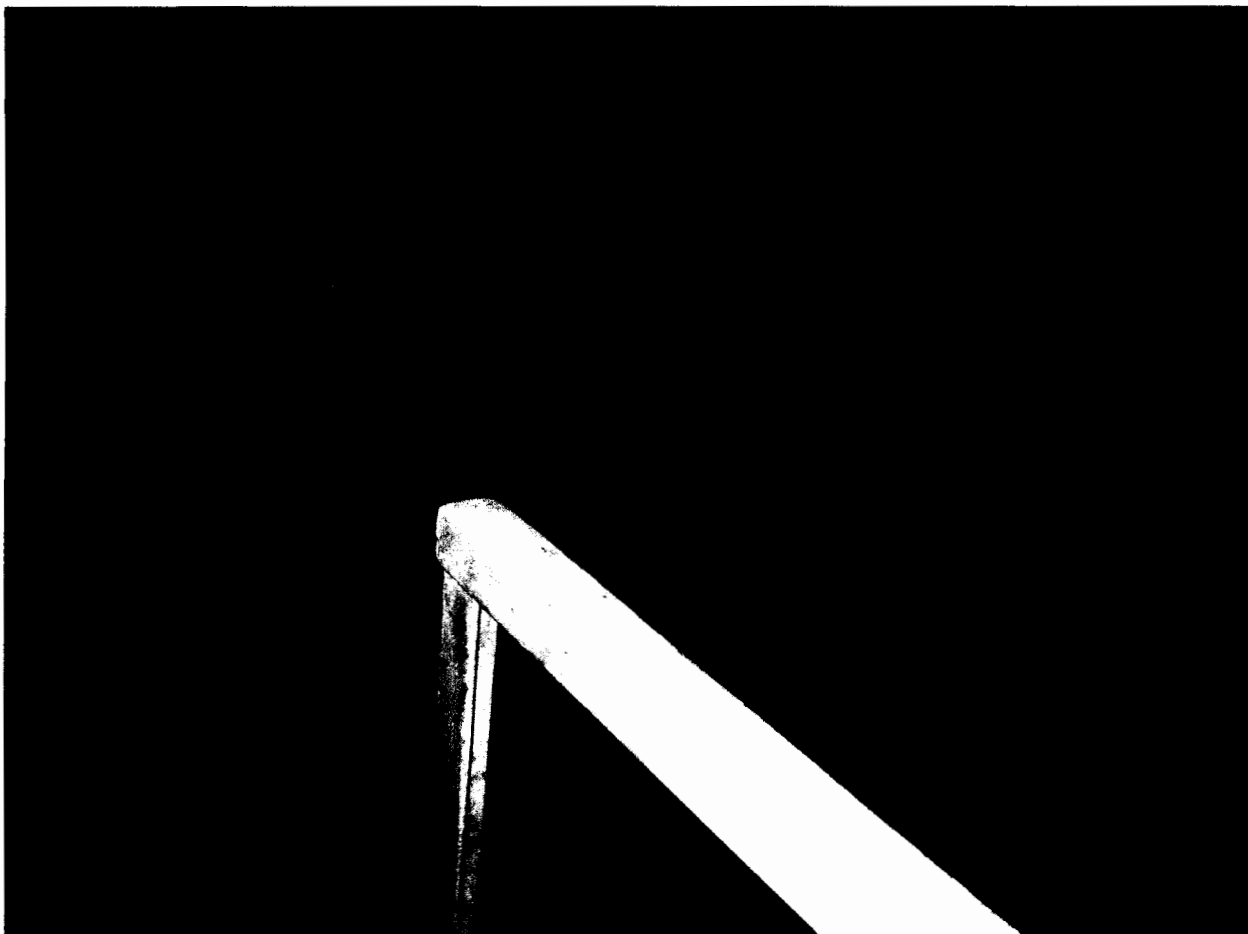
Ferro Corporation
Washington, PA
ID#: PAD041731670
Inspected: October 29, 2008
Inspector: Clark S. Conover
EPA/RIII/Wheeling
Photo #: 3

This photo depicts tank #2 in the foreground.



Ferro Corporation
Washington, PA
ID#: PAD041731670
Inspected: October 29, 2008
Inspector: Clark S. Conover
EPA/RIII/Wheeling
Photo #: 4

This photo depicts the ASTs adjacent to tank #3.



Ferro Corporation
Washington, PA
ID#: PAD041731670
Inspected: October 29, 2008
Inspector: Clark S. Conover
EPA/RIII/Wheeling
Photo #: 5

This photo depicts the waste water treatment room where tank #4 is located.



Ferro Corporation
Washington, PA
ID#: PAD041731670
Inspected: October 29, 2008
Inspector: Clark S. Conover
EPA/RIII/Wheeling
Photo #: 6

This photo depicts the waste water treatment system.